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COUNSEL/PARTIES OF RECORD	
MAR - 1 2018	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
RAQUEL LAZO  
3 Assistant Federal Public Defender  
Nevada State Bar No. 8540  
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6 Raquel\_Lazo@fd.org

7 Attorney for Jason Brotherton

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON BROTHERTON,

15 Defendant.  
16

Case No. 2:18-cr-048-JCM-GWF

**\*SEALED\* STIPULATION TO**  
**ADVANCE WAIVER OF**  
**INDICTMENT & CHANGE OF PLEA**  
**HEARING**  
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United  
18 States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United  
19 States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,  
20 Assistant Federal Public Defender, counsel for Jason Brotherton, that the Waiver of Indictment  
21 & Change of Plea hearing currently scheduled on March 14, 2018 at 10:00 a.m., be vacated and  
22 continued to a date and time convenient to the Court.

23 This Stipulation is entered into for the following reasons:

24 1. The parties respectfully request that the currently scheduled hearing on March  
25 14, 2018, be advanced before the scheduled preliminary hearing on March 13, 2018 at 4:00  
26 p.m.

2. Defendant is not incarcerated and does not object to a continuance.

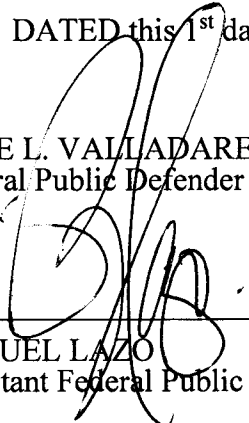
3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for continuance filed herein.

DATED this 1<sup>st</sup> day of March, 2018.

RENE L. VALLADARES  
Federal Public Defender

DAYLE ELIESON  
United States Attorney

By   
RAQUEL LAZO  
Assistant Federal Public Defender

By  (for)  
ELHAM ROOHANI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,

Case No. 2:18-cr-048-JCM-GWF

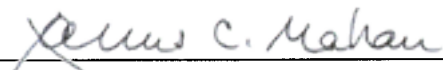
**ORDER**

5 v.  
6 JASON BROTHERTON,  
7 Defendant.  
8

9  
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Waiver of Indictment and Change of Plea  
12 hearing currently scheduled on March 14, 2018 at the hour of 10:00 a.m., be vacated and  
13 advanced to **March 13, 2018 at 10:30 a.m.**

14 DATED March 2, 2018.

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17 UNITED STATES DISTRICT JUDGE  
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